

KAUFMAN & KAHN, LLP

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CASE #:

October 17, 2024

BY ECF

10/21/2024

Hon. Colleen McMahon
U.S. District Court, S.D.N.Y.
United States Court House
500 Pearl Street
New York, NY 10007

Conference adjourned.
Colleen McMahon
10/21/2024

Re: *Safavieh Intl, LLC v. Chengdu Junsen Fengrui Technology Ltd.-Tao Shen, et al.*
(Case No. 1:23-CV-03960-CM)

To the Honorable Judge McMahon:

We are counsel for Plaintiff Safavieh Intl LLC in the above-referenced action. Pursuant to the Court's Order dated September 20, 2024 and entered the same day, the parties have filed a joint Proposed Case Management Plan (ECF #50). Because Defendant Chengdu Junsen Fengrui Technology Ltd.-Tao Shen is located in China, its counsel anticipates that responding to discovery may be slow and that any depositions will have to take place in Hong Kong (as such proceedings are not permitted in mainland China). Also, the parties anticipate needing expert discovery to address damages, at a minimum. As such, rather than completing discovery by January 23, 2025 as set forth in the September 20th Order, the parties have agreed to a discovery schedule in which discovery is completed by August 29, 2025.

The undersigned also respectfully request that because the parties have consented to the Proposed Case Management Plan, the Court adjourn *sine die* the court conference presently scheduled for October 24, 2024. Chengdu Junsen's counsel, whose office is located in Dallas, Texas, has consented to this request. The requested adjournment does not affect any other scheduled dates.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Mark S. Kaufman
Mark S. Kaufman

cc. (by ECF and email):
Tong Jin
Tim Wang